



ROPES & GRAY LLP
PRUDENTIAL TOWER
800 BOYLSTON STREET
BOSTON, MA 02199-3600
WWW.ROPESGRAY.COM

September 12, 2018

Matthew M. Burke
T +1 617 951 7589
F +1 617 235 0395
matthew.burke@ropesgray.com

BY ECF AND HAND

Honorable Joseph A. Dickson
United States District Court
Martin Luther King, Jr. Federal Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: *Lincoln Adventures, LLC v. Those Certain Underwriters at Lloyd's London*, No.
2:08-cv-00235-CCC-JAD

Dear Judge Dickson:

I write on behalf of Defendant Syndicates 510, 570, 609, 727, 958, 1003, 1084, 1096, 1245, 2003, 2020, 2488, and 2791 (the "Syndicates") in the above-referenced *Lincoln Adventures* action. On behalf of the Syndicates, I am submitting today the status report regarding the retrieval of Xchanging data in response to the Court's August 30, 2018 Order. *See* Dkt. No. 65. The status report contains sensitive competitive and proprietary information of a non-party to this litigation, and thus will be hand delivered to Chambers. We respectfully request that the report not be filed on the docket. If the report must be filed on the docket, we respectfully request the opportunity to file it under seal. The Syndicates have served today on Plaintiffs, via e-mail, a copy of the status report.

Respectfully submitted,

/s/ Matthew M. Burke
Matthew M. Burke

cc: All Counsel of Record, by CM/ECF